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U.S.A. v. Alhassane Ould Mohamed, 13 CR 0527 (WFK)

Counsel:

I write to request two clarifications of the government's submission today to the Court. In that letter, the government stated that it "no longer intends to offer into evidence at trial the December 2000 statement made by the defendant to police officers [sic] in Gao, Mali" I would appreciate it if you would confirm, as I understand the government's submission, that the government

(1) will not offer into evidence the statements that the parties have previously referred to in briefing as Statements #1a, of December 26, 2000, and #1b, of December 27, 2000, and

(2) will not call as a witness at the upcoming suppression hearing Mohamed Lamine Maiga. (I make this second inquiry since the government did not state explicitly that it would no longer call this witness, but that circumstance is a reasonable, even if not necessary, inference.)

While the Court did not order the government to provide the defense with an approximate order of its witnesses, AUSA Ahmad said to me after court that it would try to provide the witnesses that it would call the following day. Thus, I ask the government to let us know what witnesses it intends to call on Monday, January 25.

Sincerely,

/s/

Douglas G. Morris
Mildred M. Whalen
Assistant Federal Defenders
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cc: The Honorable William F. Kuntz
United States District Court Judge
Eastern District of New York

Clerk of the Court

Mr. Alhassane Ould Mohamed